

**HAHN AND ASSOCIATES, INC.**  
ENVIRONMENTAL CONSULTANTS

July 15, 2011

Mr. Dana Bayuk  
Oregon Department of Environmental Quality  
Northwest Region, Portland Office  
Portland Harbor Section  
2020 SW Fourth Avenue, Suite 400  
Portland Oregon 97201-4987

HAI Project No. 2708  
DEQ ECSI File No. 84

**SUBJECT: Progress Report, NW Natural Gasco Property, 7900 NW St. Helens Avenue, Portland, Oregon**

Dear Mr. Bayuk:

Hahn and Associates, Inc. (HAI) has prepared this monthly Progress Report summarizing Remedial Investigation/Feasibility Study (RI/FS) and source control-related work activities conducted by NW Natural that have occurred relating to the Gasco property during the month of June 2011. NW Natural is completing upland investigatory activities at the subject property under the Voluntary Agreement No. ECVV-WMCVC-NWR-94-13 (Voluntary Agreement) between NW Natural and the Oregon Department of Environmental Quality (DEQ).

**1.0 Communications and Document Submittals**

In e-mail correspondence dated June 8, 2011 (Rob Ede to Dana Bayuk), HAI provided notice to DEQ of upcoming fieldwork including collection of groundwater elevation measurements and DNAPL presence checks in NW Natural wells at the Gasco and Siltronic properties as part of the second quarter 2011 groundwater monitoring program.

In e-mail correspondence dated June 9, 2011 (Dana Bayuk to Rob Ede), DEQ acknowledged receipt of NW Natural's June 8, 2011 notice of pending fieldwork.

In e-mail correspondence dated June 16, 2011 (Ben Hung to Dana Bayuk), Anchor QEA, on behalf of NW Natural, provided a list of topics for discussion during a technical team meeting scheduled for June 20, 2011.

In e-mail correspondence date June 16, 2011 (Dana Bayuk to Ben Hung), DEQ provided feedback on the list of topics for discussion indicating that DEQ was most interested in discussing the content of the Risk Assessment work plan and the scope of work for the field sampling and analytical program.

In e-mail correspondence dated June 17, 2011 (Taku Fuji to Dana Bayuk), Anchor QEA, on behalf of NW Natural, provided clarifications regarding planned topics for discussion during a meeting scheduled for June 20, 2011 technical team meeting with DEQ.

In e-mail correspondence dated June 20, 2011 (Dana Bayuk to Ben Hung), DEQ provided feedback on the agenda items and objectives for the June 20, 2011 technical team meeting with NW Natural.

A meeting with DEQ and NW Natural technical teams occurred on June 20, 2011 to discuss items as related to the ongoing DEQ review of the May 2011 *Draft Groundwater Source Control Final Design Report*, and the technical approach deemed necessary for completion of the Upland Risk Assessment for the NW Natural Gasco property.

In e-mail correspondence dated June 22, 2011 (Taku Fuji to Dana Bayuk), Anchor QEA, on behalf of NW Natural, provided a summary of discussion during the June 20, 2011 meeting as related to areas of DEQ agreement or disagreement with NW Natural's proposed process for finalization of the Upland Risk Assessment (as previously provided to DEQ in correspondence dated May 27, 2011).

In e-mail correspondence dated June 23, 2011 (Dana Bayuk to Taku Fuji), DEQ acknowledged receipt of NW Natural's June 22, 2011 summary of the June 20, 2011 meeting as related to discussion of NW Natural's May 27, 2011 proposed process for finalization of the Upland Risk Assessment.

## **2.0 Field Work**

Field activities related to monitoring and maintenance of the dense non-aqueous phase liquid (DNAPL) extraction system at surficial fill well locations MW-6-32 and MW-13-30 occurred during June. The system recovered approximately 13 gallons of fluids (primarily DNAPL) during June prior to shutting down due to the level of product in the storage tank triggering the high level switch. The system remained turned off during the remainder of June as HAI and NW Natural updated chemical profile documentation to allow the stored liquid to be recycled by Thermo Fluids, Inc. of Clackamas, Oregon.

Approximately 1.5 gallons of DNAPL was manually removed from within the sump at the PW-01-80 well location during June.

Groundwater elevation measurements were collected from monitoring wells on both the Gasco and Siltronic properties on June 15, 2011 as part of the NW Natural second quarter 2011 groundwater monitoring event.

Discharge of treated water (groundwater from the LNG containment basin) to the City of Portland sanitary sewer was initiated on March 16, 2007 under Temporary Wastewater Discharge Permit 500.022 (expires February 15, 2012). Results of NW Natural's effluent sampling are provided to BES in Discharge Monitoring Reports that are submitted for any month that effluent sampling occurs – which is at least every other month in accordance with the permit. As of June 30, 2011, a total of 8,311,041 gallons of treated water have been discharged to the sanitary sewer in 2011.

## **3.0 Anticipated Activities in July and August 2011**

NW Natural is preparing a Risk Assessment Data Gap Field Sampling Plan (FSP) as requested by DEQ for finalization of the Gasco Upland Risk Assessment. The FSP is anticipated to be submitted to DEQ in August.

NW Natural and DEQ technical working group meetings are anticipated to occur during August as needed so that discussion of critical items related to upland risk assessment and groundwater source control tasks may be conducted.

NW Natural is working on an update to the beneficial use determination for groundwater and anticipates submittal of this document to DEQ upon receipt of water use plans from pertinent property owners.

The following reports and work plans on the Site have been submitted to DEQ through the end of June that have not as of the date of this Progress Report received DEQ review and comment.

- *Source Control Evaluation Report, "Segment 3" Siltronic Property Related to NW Natural "Gasco" Site*, February 19, 2009, Anchor QEA. Based on DEQ feedback, DEQ review is expected after approval of NW Natural's design for Source Control Measures for Segments 1 and 2 is issued.
- Recommendations for cyanide testing at the Gasco Site, August 17, 2010, Anchor QEA. Based on DEQ feedback, it is understood that DEQ review is being conducted concurrently with review of the May 2011 *Draft Groundwater Source Control Final Design Report*.
- *Final Stormwater Source Control Data Summary Report*, September 2010, Anchor QEA. Although this document was submitted in 2010, it was previously omitted from the list of documents pending review due to an oversight. The anticipated review schedule for this document will be added to future progress reports once feedback is received regarding the agency's review strategy.
- *Remedial Investigation Data Summary Report, Historical Manufactured Gas Plant Activities, Siltronic Corporation Property*, March 31, 2011, HAI. Based on DEQ feedback, it is understood that DEQ review is being conducted at this time, but that comments are not anticipated until after completion of DEQ's review of the May 2011 *Draft Groundwater Source Control Final Design Report*.
- *Draft Groundwater Source Control Final Design Report, NW Natural Gasco Site*, May 2011, Anchor QEA. Based on DEQ feedback, review is being completed at this time, with comments anticipated during the late July timeframe.
- Summary of Discussion of Key Issues During Meeting on June 20<sup>th</sup>, 2011 – Gasco Uplands Risk Assessment, June 22, 2011, Anchor QEA. Based on DEQ feedback, review is being completed at this time.

Should you have any questions, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rob Ede', followed by a long horizontal flourish.

Rob Ede, R.G.  
Principal

[robe@hahnenv.com](mailto:robe@hahnenv.com)

c: Ms. Sandra Hart, NW Natural (electronic only)  
Mr. Bob Wyatt, NW Natural (electronic only)  
Ms. Patty Dost, Pearl Legal Group PC (electronic only)  
Ms. Sarah Riddle, Pearl Legal Group PC (electronic only)  
Mr. Carl Stivers, Anchor QEA, L.L.C. (electronic only)  
Mr. John Edwards, Anchor QEA, L.L.C. (electronic only)  
Mr. Ben Hung, Anchor QEA, L.L.C. (electronic only)  
Mr. Ryan Barth, Anchor QEA, L.L.C. (electronic only)  
Mr. Henning Larsen, DEQ NW Region (electronic only)  
Mr. Tom Gainer, DEQ NW Region (electronic only)  
Mr. Tom McCue, Siltronic Corporation (electronic only)  
Ms. Kristine Koch, Region 10 EPA (electronic only)  
Mr. Sean Sheldrake, Region 10 EPA (electronic only)  
Mr. Rene Fuentes, Region 10 EPA (electronic only)  
Mr. Chip Humphrey, Region 10 EPA (electronic only)  
Mr. Lance Peterson, CDM, Inc. (electronic only)